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March 7, 2023

VIA ECF

The Honorable George B. Daniels, United States District Judge
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *In re Terrorist Attacks on September 11, 2001, No. 03-md-1570 (GBD) (SN)*
Mandelkow et al. v. Islamic Republic of Iran, No. 20-cv-00315 (GBD) (SN)
Alcabes et al. v. Islamic Republic of Iran, No. 20-cv-00340 (GBD) (SN)
Anderson et al. v. Islamic Republic of Iran, No. 20-cv-00354 (GBD) (SN)
Ahearn et al. v. Islamic Republic of Iran, No. 20-cv-00355 (GBD) (SN)
Asciutto et al. v. Islamic Republic of Iran, No. 20-cv-00411 (GBD) (SN)
Amin et al. v. Islamic Republic of Iran, No. 20-cv-00412 (GBD) (SN)
Basci et al. v. Islamic Republic of Iran, No. 20-cv-00415 (GBD) (SN)

Request for Extension of Time to File Objections to Report and Recommendation and Supplemental Evidence

Dear Judge Daniels:

On behalf of the Plaintiffs in the above-captioned seven cases, each of which is a part of the multi-district litigation *In re Terrorist Attacks on September 11, 2001*, we submit this letter to request a 45-day extension of the deadlines to file objections to Magistrate Judge Netburn's March 3, 2023 Report and Recommendation ("Report"), Dkt. 8901, and to file the supplemental evidence described in Appendix A to the Report.

The Report recommended denying the Plaintiffs' motions for default judgment, Dkts. 8346, 8350, 8354, 8358, 8362, 8369, 8373, as to surviving family members ("Surviving Family Members") of people who developed chronic and ultimately fatal medical conditions after

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9/11-related environmental exposures (“Latent Injury Plaintiffs”). The Report further indicated in Appendix A that certain judgments and awards in favor of the estates of Latent Injury Plaintiffs were contingent on the filing of supplemental evidence, to be filed within the 14-day deadline for filing objections to the Report.

Given the significant issues regarding causation for injuries to the Surviving Family Members which are addressed in the Report for the first time in this litigation, and the need to coordinate regarding the submission of supplemental evidence, we request a 45-day extension of the 14-day deadline to file objections pursuant to Fed. R. Civ. P. 72(b)(2), and the same extension to the deadline to file supplemental evidence pursuant to Appendix A of the Report. Currently, objections to the Report and supplemental evidence regarding certain estates are due March 17, 2023. We propose that the deadline be extended to May 1, 2023.

This is the first request for an extension of this deadline. We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Barry Salzman

Barry Salzman

cc: All counsel via ECF